

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RICHARD DUFF,

Plaintiff,

vs.

U.S.D.C. #

Judge

Mag. Judge

Lower Court Case No. 16-3507-GC

Hon. John M. Chmura

EXPERIAN INFORMATION SOLUTIONS, INC.,
an Ohio corporation, and VERIZON WIRELESS
PERSONAL COMMUNICATIONS, L.P., a Delaware
Corporation,

Defendants.

<p>GARY D. NITZKIN (P41155) TRAVIS SHACKELFORD (P68710) MICHIGAN CONSUMER CREDIT LAWYERS Attorneys for Plaintiff 22142 West Nine Mile Road Southfield, MI 48033 (248) 353-2882 – Telephone (248) 353-4840 – Fax gary@micreditlawyer.com</p>	<p>JEFFREY S. HENGEVELD (P66029) PLUNKETT COONEY Attorneys for Defendant Verizon Only 38505 Woodward Ave., Suite 2000 Bloomfield Hills, MI 48304 (248) 594-8202 - Telephone (248) 901-4040 - Fax jhengeveld@plunkettcooney.com</p>
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NOTICE OF FILING REMOVAL

NOTICE OF REMOVAL TO FEDERAL COURT

VERIFICATION

PROOF OF SERVICE

STATE OF MICHIGAN
IN THE 37TH DISTRICT COURT

RICHARD DUFF,

Plaintiff,

vs.

Case No. 16-3507-GC
Hon. John M. Chmura

EXPERIAN INFORMATION SOLUTIONS, INC.,
an Ohio corporation, and VERIZON WIRELESS
PERSONAL COMMUNICATIONS, L.P., a Delaware
Corporation,

Defendants.

<p>GARY D. NITZKIN (P41155) TRAVIS SHACKELFORD (P68710) MICHIGAN CONSUMER CREDIT LAWYERS Attorneys for Plaintiff 22142 West Nine Mile Road Southfield, MI 48033 (248) 353-2882 – Telephone (248) 353-4840 – Fax gary@micreditlawyer.com</p>	<p>JEFFREY S. HENGEVELD (P66029) PLUNKETT COONEY Attorneys for Defendant Verizon Only 38505 Woodward Ave., Suite 2000 Bloomfield Hills, MI 48304 (248) 594-8202 - Telephone (248) 901-4040 - Fax jhengeveld@plunkettcooney.com</p>
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NOTICE OF FILING REMOVAL

TO: CLERK OF THE COURT, 37th District Court for the State of Michigan
Gary D. Nitzkin, Esq.

Defendant, New Par (improperly named as Verizon Wireless Personal Communications, P.C.), through its attorneys, Plunkett Cooney, and pursuant to 28 U.S.C. § 1441 *et seq.*, hereby provides notice to the Clerk of the 37th District Court for the State of Michigan of the removal of this case to the United States District Court for the Eastern District of Michigan, Southern Division.

Respectfully submitted,

PLUNKETT COONEY

By:



Jeffrey S. Hengeveld (P66029)

Attorney for Defendant Verizon Only

38505 Woodward Ave., Ste. 2000

Bloomfield Hills, MI 48304

(248) 594-8202

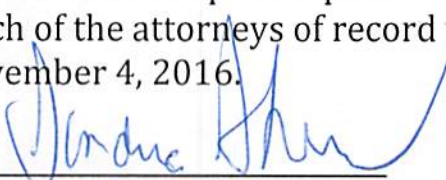
jhengeveld@plunkettcooney.com

Dated: November 4, 2016

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record via First Class Mail on November 4, 2016.

Signature:



Sandra Sherbow

EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RICHARD DUFF,

Plaintiff,

vs.

U.S.D.C. #

Judge

Mag. Judge

Lower Court Case No. 16-3507-GC

Hon. John M. Chmura

EXPERIAN INFORMATION SOLUTIONS, INC.,
an Ohio corporation, and VERIZON WIRELESS
PERSONAL COMMUNICATIONS, L.P., a Delaware
Corporation,

Defendants.

GARY D. NITZKIN (P41155)
TRAVIS SHACKELFORD (P68710)
MICHIGAN CONSUMER CREDIT
LAWYERS
Attorneys for Plaintiff
22142 West Nine Mile Road
Southfield, MI 48033
(248) 353-2882 - Telephone
(248) 353-4840 - Fax
gary@micreditlawyer.com

JEFFREY S. HENGEVELD (P66029)
PLUNKETT COONEY
Attorneys for Defendant New Par,
improperly named as Verizon, Only
38505 Woodward Ave., Suite 2000
Bloomfield Hills, MI 48304
(248) 594-8202 - Telephone
(248) 901-4040 - Fax
jhengeveld@plunkettcooney.com

NOTICE OF REMOVAL TO FEDERAL COURT

TO: HONORABLE JUDGES OF THE U.S. DISTRICT COURT
Eastern District of Michigan, Southern Division
Gary D. Nitzkin, Esq.

Defendant, New Par (improperly named as "Verizon Wireless Personal Communications, P.C.")(“New Par”), through its attorneys, Plunkett Cooney, and pursuant to 28 U.S.C. § 1441 *et seq.*, removes this action from the 37th District Court for the State of Michigan, Case No. 16-3507-GC, to the United States District Court for the Eastern District of Michigan, Southern Division. In support of this Removal, New Par states as follows:

1. Plaintiff commenced this case in the 37th District Court for the State of Michigan by filing a Summons and Complaint on September 26, 2016, which is attached as Exhibit A. A copy of the court docket is not available online to New Par, however, the documents in Exhibit A are all the process, pleadings, and orders received by New Par.

2. New Par is seeking removal based upon a federal question arising from the alleged violation of the Fair Credit Reporting Act presented in Plaintiff’s Complaint.

3. Given the federal question presented, the District Court of the United States has original jurisdiction under 28 U.S.C. 1331 and this action is properly removable under 28 U.S.C. § 1441(a).

4. This notice is filed with this Court within thirty (30) days after the date of service of process upon New Par, which service occurred on October 7, 2016. Removal is therefore timely.

5. A copy of this notice will be given to all adverse parties and to the clerk of the 37th District Court for the State of Michigan pursuant to 28 U.S.C. § 1446(d).

WHEREFORE, Defendant, New Par (improperly named as "Verizon Wireless Personal Communications, L.P."), requests that this Court assume jurisdiction over this action and grant such other relief as the Court deems proper.

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Jeffrey S. Hengeveld
Jeffrey S. Hengeveld (P66029)
Attorneys for Defendant New Par,
improperly named as Verizon, Only
38505 Woodward Ave., Ste. 2000
Bloomfield Hills, MI 48304
(248) 594-8202
jhengeveld@plunkettcooney.com

Dated: November 4, 2016

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record via the Court's Electronic Filing System on November 4, 2016 and by First Class Mail to those not part of the EFS.

Signature: /s/ Sandra Sherbow
Sandra Sherbow

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RICHARD DUFF,

Plaintiff,

vs.

U.S.D.C. #

Judge

Mag. Judge

Lower Court Case No. 16-3507-GC

Hon. John M. Chmura

EXPERIAN INFORMATION SOLUTIONS, INC.,
an Ohio corporation, and VERIZON WIRELESS
PERSONAL COMMUNICATIONS, L.P., a Delaware
Corporation,

Defendants.

<p>GARY D. NITZKIN (P41155) TRAVIS SHACKELFORD (P68710) MICHIGAN CONSUMER CREDIT LAWYERS Attorneys for Plaintiff 22142 West Nine Mile Road Southfield, MI 48033 (248) 353-2882 - Telephone (248) 353-4840 - Fax gary@micreditlawyer.com</p>	<p>JEFFREY S. HENGEVELD (P66029) PLUNKETT COONEY Attorneys for Defendant New Par, improperly named as Verizon, Only 38505 Woodward Ave., Suite 2000 Bloomfield Hills, MI 48304 (248) 594-8202 - Telephone (248) 901-4040 - Fax jhengeveld@plunkettcooney.com</p>
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VERIFICATION

Jeffrey S. Hengeveld, first being duly sworn, states that he is the attorney for Defendant, New Par (improperly named as "Verizon Wireless Personal Communications, L.P."), and that the foregoing Notice of Removal is true in substance and in fact to the best of his knowledge, information and belief.

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Jeffrey S. Hengeveld
Jeffrey S. Hengeveld (P66029)
Attorneys for Defendant New Par,
improperly named as Verizon, Only
38505 Woodward Ave., Ste. 2000
Bloomfield Hills, MI 48304
(248) 594-8202
jhengeveld@plunkettcooney.com

Dated: November 4, 2016

Subscribed and sworn to before me
on November 4, 2016
/s/ SANDRA SHERBOW
Notary Public
Oakland County, Michigan
My Commission Expires: 03-21-2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RICHARD DUFF,

Plaintiff,

vs.

U.S.D.C. #

Judge

Mag. Judge

Lower Court Case No. 16-3507-GC

Hon. John M. Chmura

EXPERIAN INFORMATION SOLUTIONS, INC.,
an Ohio corporation, and VERIZON WIRELESS
PERSONAL COMMUNICATIONS, L.P., a Delaware
Corporation,

Defendants.

GARY D. NITZKIN (P41155) TRAVIS SHACKELFORD (P68710) MICHIGAN CONSUMER CREDIT LAWYERS Attorneys for Plaintiff 22142 West Nine Mile Road Southfield, MI 48033 (248) 353-2882 - Telephone (248) 353-4840 - Fax gary@micreditlawyer.com	JEFFREY S. HENGEVELD (P66029) PLUNKETT COONEY Attorneys for Defendant New Par, improperly named as Verizon, Only 38505 Woodward Ave., Suite 2000 Bloomfield Hills, MI 48304 (248) 594-8202 - Telephone (248) 901-4040 - Fax jhengeveld@plunkettcooney.com
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CERTIFICATE OF SERVICE

I hereby certify that on November 4, 2016, I electronically filed the foregoing Removal Package with the Clerk of the Court using the ECF system and that I have mailed by United States Postal Service to any parties that are not ECF participants.

Respectfully submitted,

PLUNKETT COONEY

By: /s/ Jeffrey S. Hengeveld
Jeffrey S. Hengeveld (P66029)
Attorneys for Defendant New Par,
improperly named as Verizon, Only
38505 Woodward Ave., Ste. 2000
Bloomfield Hills, MI 48304
(248) 594-8202
jhengeveld@plunkettcooney.com

Dated: November 4, 2016

Open.00085.63610.17642760-1

EXHIBIT A

Approved, SCAO

Original - Court
1st copy - Defendant2nd copy - Plaintiff
3rd copy - Return

STATE OF MICHIGAN 37th JUDICIAL DISTRICT JUDICIAL CIRCUIT COUNTY PROBATE	SUMMONS AND COMPLAINT <i>Judge Chmura</i>	CASE NO. <i>163507 GC</i>
Court address 8300 Common Rd., Warren, MI 48093		Court telephone no. (586) 574-4900

Plaintiff's name(s), address(es), and telephone no(s).

Richard Duff
 c/o MICHIGAN CONSUMER CREDIT LAWYERS
 22142 W. Nine Mile Rd.
 Southfield, MI 48033
 (248) 353-2882

v

Defendant's name(s), address(es), and telephone no(s).

Experian Information Solutions, Inc. and
 Verizon Wireless Personal Communications, L.P.

Plaintiff's attorney, bar no., address, and telephone no.

Gary D. Nitzkin P41155
 MICHIGAN CONSUMER CREDIT LAWYERS
 22142 W. Nine Mile Rd.
 Southfield, MI 48033
 (248) 353-2882

SUMMONS NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons to file a written answer with the court and serve a copy on the other party or take other lawful action with the court (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.

Issued <i>9/27/16</i>	This summons expires <i>10/18/16</i>	Court clerk <i>AB</i>
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This summons is void unless served on or before its expiration date. This document must be sealed by the seal of the court.

COMPLAINT Instruction: The following is information that is required to be in the caption of every complaint and is to be completed by the plaintiff. Actual allegations and the claim for relief must be stated on additional complaint pages and attached to this form.
☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035.
Family Division Cases
☐ There is no other pending or resolved action within the jurisdiction of the family division of circuit court involving the family or family members of the parties.

☐ An action within the jurisdiction of the family division of the circuit court involving the family or family members of the parties has been previously filed in _____ Court.
The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
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General Civil Cases
☒ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.

☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has been previously filed in _____ Court.
The action ☐ remains ☐ is no longer pending. The docket number and the judge assigned to the action are:

Docket no.	Judge	Bar no.
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VENUE

Plaintiff(s) residence (include city, township, or village) Warren, Michigan	Defendant(s) residence (include city, township, or village) Bingham Farms, Michigan
Place where action arose or business conducted Warren, Michigan	

9-21-16
 Date

Gary D. Nitzkin w/permission
 Signature of attorney/plaintiff

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

MC 01 (5/15) SUMMONS AND COMPLAINT MCR 2.102(B)(11), MCR 2.104, MCR 2.105, MCR 2.107, MCR 2.113(C)(2)(e), (b), MCR 3.208(A)

PROOF OF SERVICE**SUMMONS AND COMPLAINT**

Case No. _____

TO PROCESS SERVER: You are to serve the summons and complaint not later than 91 days from the date of filing or the date of expiration on the order for second summons. You must make and file your return with the court clerk. If you are unable to complete service you must return this original and all copies to the court clerk.

CERTIFICATE/AFFIDAVIT OF SERVICE/NONSERVICE☐ **OFFICER CERTIFICATE**

OR

☐ **AFFIDAVIT OF PROCESS SERVER**

I certify that I am a sheriff, deputy sheriff, bailiff, appointed court officer, or attorney for a party (MCR 2.104[A][2]), and that: (notarization not required)

Being first duly sworn, I state that I am a legally competent adult who is not a party or an officer of a corporate party, and that: (notarization required)

- ☐ I served personally a copy of the summons and complaint,
☐ I served by registered or certified mail (copy of return receipt attached) a copy of the summons and complaint,
 together with _____

List all documents served with the Summons and Complaint

_____ on the defendant(s):

Defendant's name	Complete address(es) of service	Day, date, time

- ☐ I have personally attempted to serve the summons and complaint, together with any attachments, on the following defendant(s) and have been unable to complete service.

Defendant's name	Complete address(es) of service	Day, date, time

I declare that the statements above are true to the best of my information, knowledge, and belief.

Service fee	Miles traveled	Mileage fee	Total fee
\$		\$	\$

Signature _____

Name (type or print) _____

Title _____

Subscribed and sworn to before me on _____ Date _____ County, Michigan.

My commission expires: _____ Date _____ Signature: _____
 Deputy court clerk/Notary public

Notary public, State of Michigan, County of _____

ACKNOWLEDGMENT OF SERVICE

I acknowledge that I have received service of the summons and complaint, together with _____

Attachments

_____ on

Day, date, time

on behalf of _____

Signature

STATE OF MICHIGAN
IN THE 37th DISTRICT COURT

RICHARD DUFF,
Plaintiff,

v.

EXPERIAN INFORMATION SOULTIONS, INC.,
an Ohio corporation, and
VERIZON WIRELESS PERSONAL COMMUNICATONS, L.P.,
a Delaware corporation,
Defendants.

GARY D. NITZKIN (P41155)
TRAVIS SHACKELFORD (P68710)
MICHIGAN CONSUMER CREDIT LAWYERS
Attorneys for Plaintiff
22142 West Nine Mile Road
Southfield, MI 48033
Phone (248) 353-2882
Fax (248) 353-4840
Email – gary@micreditlawyer.com

RECEIVED FOR FILING
37TH JUDICIAL DISTRICT
WARREN-CENTERLINE
2017 SEP 26 PM 3:28

COMPLAINT AND JURY DEMAND

**NOW COMES THE PLAINTIFF, RICHARD DUFF, THROUGH COUNSEL,
MICHIGAN CONSUMER CREDIT LAWYERS, BY GARY D. NITZKIN, and for his
Complaint against the Defendants, plead as follows:**

VENUE

1. The transactions and occurrences which give rise to this action occurred in the city of Warren, Macomb County, Michigan.
2. Venue is proper in 37th District Court in Macomb County, Michigan as the actions and occurrences recited herein occurred in Warren, in Macomb County, Michigan.
3. The amount in controversy is less than twenty five thousand dollars (\$25,000.00) exclusive of costs, interest and attorney's fees.

PARTIES

4. The Defendants to this lawsuit are:
- a. Experian Information Solutions, Inc. ("Experian") which is an Ohio corporation that maintains a registered agent in Oakland County, Michigan; and
 - b. Verizon Personal Communications, L.P. ("Verizon") which is a Delaware company that maintains a registered agent in Oakland County, Michigan.

GENERAL ALLEGATIONS

5. On or about April 20, 2016, Mr. Duff obtained his credit files and noticed that Verizon reported a trade line with account number 987695**** ("Bogus Trade Line").
-
6. Mr. Duff previously had an account with Verizon but that account has been paid off. The Verizon account, which is the subject of the Bogus Trade Line, does not belong to him as he is the victim of identity theft.
7. On or about May 3, 2016, Mr. Duff filed a police report with the Warren Police Department regarding the identity theft.
8. On or about June 21, 2016, Mr. Duff submitted a letter to Experian disputing the Bogus Trade Line. He attached a copy of his police report and requested that the Bogus Trade Line be removed from his Experian credit file.
9. Upon information and belief, Experian forwarded Mr. Duff's consumer dispute to Verizon.
10. On or about July 1, 2016, Mr. Duff received correspondence from Experian which stated that an Initial Security Alert had been added to his credit file.
11. On or about July 1, 2016, Mr. Duff received Experian's investigation results which showed that Verizon no longer reported the Bogus Trade Line.

12. However, on or about July 8, 2016, Mr. Duff received correspondence from Experian again stating that it had added a temporary initial Security Alert to his Experian credit file. With this letter, it attached his Experian credit file which showed that the Bogus Trade Line had been reinserted.

COUNT I

NEGLIGENT VIOLATION OF THE FAIR CREDIT REPORTING ACT BY VERIZON

13. Plaintiff realleges the above paragraphs as if recited verbatim.
14. After being informed by Experian of Mr. Duff's consumer dispute to the Bogus Trade Line, Verizon negligently failed to conduct a proper investigation of Mr. Duff's dispute as required by 15 USC 1681s-2(b).
15. Verizon negligently failed to review all relevant information available to it and provided by Experian in conducting its reinvestigation as required by 15 USC 1681s-2(b). Specifically, it failed to direct Experian to remove the Bogus Trade Line.
16. The Bogus Trade Line is inaccurate and creating a misleading impression on Mr. Duff's consumer credit file with Experian to which it is reporting such trade line.
17. As a direct and proximate cause of Verizon's negligent failure to perform its duties under the FCRA, Mr. Duff has suffered damages, mental anguish, suffering, humiliation and embarrassment.
18. Verizon is liable to Mr. Duff by reason of its violations of the FCRA in an amount to be determined by the trier of fact together with reasonable attorneys' fees pursuant to 15 USC 1681o.

19. Mr. Duff has a private right of action to assert claims against Verizon arising under 15 USC 1681s-2(b).

WHEREFORE, PLAINTIFF PRAYS that this court grant him a judgment against the Defendant Verizon for damages, costs, interest and attorneys' fees in the amount of less than twenty five thousand dollars (\$25,000.00) exclusive of costs, interest and attorney's fees.

COUNT II

**WILLFUL VIOLATION OF THE FAIR CREDIT REPORTING ACT
BY VERIZON**

20. Plaintiff realleges the above paragraphs as if recited verbatim.

21. After being informed by Experian that Mr. Duff disputed the accuracy of the information it was providing, Verizon willfully failed to conduct a proper reinvestigation of Mr. Duff's dispute.

22. Verizon willfully failed to review all relevant information available to it and provided by Experian as required by 15 USC 1681s-2(b).

23. As a direct and proximate cause of Verizon's willful failure to perform its respective duties under the FCRA, Mr. Duff has suffered damages, mental anguish, suffering, humiliation and embarrassment.

24. Verizon is liable to Mr. Duff for either statutory damages or actual damages he has sustained by reason of its violations of the FCRA in an amount to be determined by the trier of fact, together with an award of punitive damages in the amount to be determined by the trier of fact, as well as for reasonable attorneys' fees and he may recover therefore pursuant to 15 USC 1681n.

WHEREFORE, PLAINTIFF PRAYS that this court grant him a judgment against Verizon for the greater of statutory or actual damages, plus punitive damages, along with costs, interest and attorneys' fees in the amount of less than twenty five thousand dollars (\$25,000.00) exclusive of costs, interest and attorney's fees.

COUNT III

**NEGLIGENT VIOLATION OF THE FAIR CREDIT REPORTING ACT
BY EXPERIAN**

25. Plaintiff realleges the above paragraphs as if recited verbatim.

26. Defendant Experian prepared, compiled, issued, assembled, transferred, published and otherwise reproduced consumer reports regarding Mr. Duff as that term is defined in 15 USC 1681a.

27. Such reports contained information about Mr. Duff that was false, misleading and inaccurate.

28. Experian negligently failed to maintain and/or follow reasonable procedures to assure maximum possible accuracy of the information it reported to one or more third parties pertaining to Mr. Duff, in violation of 15 USC 1681e(b).

29. After receiving Mr. Duff's consumer dispute to the Bogus Trade Line, Experian negligently failed to conduct a reasonable reinvestigation as required by 15 U.S.C. 1681i.

30. As a direct and proximate cause of Experian's negligent failure to perform its duties under the FCRA, Mr. Duff has suffered actual damages, mental anguish and suffering, humiliation and embarrassment.

31. Experian is liable to Mr. Duff by reason of its violation of the FCRA in an amount to be determined by the trier of fact together with his reasonable attorneys' fees pursuant to 15 USC 1681o.

WHEREFORE, PLAINTIFF PRAYS that this court grant him a judgment against Experian for actual damages, costs, interest and attorneys' fees in the amount of less than twenty five thousand dollars (\$25,000.00) exclusive of costs, interest and attorney's fees.

COUNT IV

**WILLFUL VIOLATION OF THE FAIR CREDIT REPORTING ACT
BY EXPERIAN**

32. Plaintiff realleges the above paragraphs as if recited verbatim.

33. Defendant Experian prepared, compiled, issued, assembled, transferred, published and otherwise reproduced consumer reports regarding Mr. Duff as that term is defined in 15 USC 1681a.

34. Such reports contained information about Mr. Duff that was false, misleading and inaccurate.

35. Experian willfully failed to maintain and/or follow reasonable procedures to assure maximum possible accuracy of the information that it reported to one or more third parties pertaining to Mr. Duff, in violation of 15 USC 1681e(b).

36. After receiving Mr. Duff's consumer dispute to the Bogus Trade Line, Experian willfully failed to conduct a reasonable reinvestigation as required by 15 U.S.C. 1681i.

37. As a direct and proximate cause of Experian's willful failure to perform its duties under the FCRA, Mr. Duff has suffered actual damages, mental anguish and suffering, humiliation and embarrassment.

38. Experian is liable to Mr. Duff by reason of its violations of the FCRA in an amount to be determined by the trier of fact together with his reasonable attorneys' fees pursuant to 15 USC 1681n.

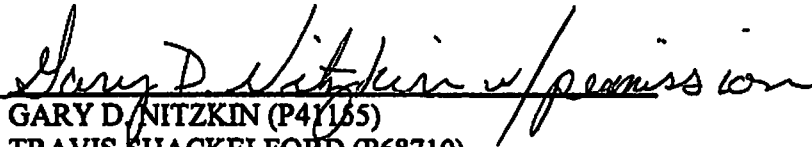
WHEREFORE, PLAINTIFF PRAYS that this court grant him a judgment against Defendant Experian for the greater of statutory or actual damages, plus punitive damages along ~~with costs, interest and reasonable attorneys' fees in the amount of less than twenty five thousand~~ dollars (\$25,000.00) exclusive of costs, interest and attorney's fees.

JURY DEMAND

Plaintiff hereby demands a trial by Jury.

Respectfully submitted,

September 14, 2016

w/permission

GARY D. NITZKIN (P41165)

TRAVIS SHACKELFORD (P68710)

MICHIGAN CONSUMER CREDIT LAWYERS

Attorneys for Plaintiff

22142 West Nine Mile Road

Southfield, MI 48033

(248) 353-2882

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Email – gary@micreditlawyer.com
